

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In re:)	
)	Case No. 20-10313
JAMES MICHAEL STRITCH,)	Chapter 13
)	
Debtor.)	
)	

**NOTICE OF MOTION FOR LEAVE TO FILE A POST-DEADLINE PROOF OF
CLAIM, RESPONSE DEADLINE AND HEARING DATE**

National Funding, Inc. (“National Funding”) has filed its Motion for Leave to File a Post-Deadline Proof of Claim (“Motion”) with the bankruptcy court for leave of court to file a proof of claim after the claims bar date.

1. **Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult an attorney).**
2. **If you do not want the court to grant the relief sought in the Motion or if you want the court to consider your views on the Motion, then on or before 04/07/21 you or your attorney must file a response to the Motion.** (See Instructions on next page).
3. **A hearing on the Motion is scheduled to be held on 04/20/21, at 10:30 in Courtroom #2, United States Bankruptcy Court, For the Eastern District of Pennsylvania Robert C. Nix Building, 900 Market Street Philadelphia, PA 19107.** Unless the court orders otherwise, the hearing on this matter will be an **evidentiary hearing.**
4. **If you do not file a response to the Motion,** the court may cancel the hearing and enter an order granting the relief requested in the Motion.
5. You may contact the Bankruptcy Clerk’s office for Philadelphia cases at (215) 408-2800

and for Reading cases at 610-208-5040 to find out whether the hearing has been canceled because no one filed a response.

6. If a Copy of the motion is not enclosed, a copy of the Motion will be provided to you if you request a copy from the attorney whose name and address is listed on the next page of this Notice.

Filing Instructions

7. **If you are required to file documents electronically by Local Bankruptcy Rule 5005-1**, you must file your response electronically.

8. **If you are not required to file electronically**, you must file your response at

Clerk of the Bankruptcy Court
United States Bankruptcy Court
For the Eastern District of Pennsylvania
Robert C. Nix Building
900 Market Street
Philadelphia, PA 19107

9. **If you mail your response** to the bankruptcy clerk's office for filing, you must mail it early enough so that it will be received on or before the date stated in Paragraph 2 on the pervious page of the Notice.
10. On the same day that you file or mail your Response to the Motion, you must mail or deliver a copy of the Response to the movant's attorney:

Jonathan R. Avolio
Gordon Rees Scully Mansukhani, LLP
Three Logan Square, 1717 Arch Street, Suite 610
Philadelphia, PA 1910
Telephone: (215) 717-4029
Fax: (215) 693-6650
javolio@grsm.com

Date: March 24, 2021

Respectfully Submitted,

GORDON REES SCULLY MANSUKHANI, LLP

/s/ Jonathan R. Avolio

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ATTORNEYS FOR NATIONAL FUNDING, INC.

CERTIFICATE OF SERVICE

I, the undersigned hereby certify that a true and accurate copy of the foregoing document has been duly and properly served upon all counsel herein by way of electronic filing on the Court's ECF Notice List on March 24, 2021.

/s/ Annie Matthews

Annie Matthews